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VIA ECF

March 12, 2015

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Kristen McCallion
Principal
McCallion@fr.com
212 641 2261 direct

Re: *Shenanzhu LLC d/b/a The Diner v. Cambria Company LLC, Space150, LLC, William Jurewicz, David Denham, Mark Davis, and Martin Davis, and John and Jane Does 1 Through 100, all whose true names are unknown: 1:15-CV-000338 (WHP)*

Dear Judge Pauley:

This firm represents Cambria Company LLC, Mark Davis, and Martin Davis (the “Cambria Defendants”) in the above-identified action. This letter is submitted pursuant to Rule I(D) of Your Honor’s Individual Practices, and jointly by the Cambria Defendants and Space150, LLC, William Jurewicz, and David Denham (the “Space150 Defendants”). Counsel for the Space150 Defendants are copied on this letter.

The complaint in this action was filed by Plaintiff, Shenanzhu LLC d/b/a The Diner, on January 16, 2015. The Cambria Defendants were served on February 19, 2015, such that their current deadline to answer or otherwise respond to the complaint is March 12, 2015. Defendant David Denham was served on February 26, 2015, such that his current deadline to answer or otherwise respond to the complaint is March 19, 2015. The remaining Defendants, William Jurewicz and Space 150, LLC¹ have not yet been properly served. These two Defendants have agreed to waive formal service of the complaint, however.

In an effort to promote judicial efficiency and avoid multiple filing deadlines, the Cambria Defendants and the Space150 Defendants respectfully request the Court’s permission to answer or otherwise respond to the complaint by Tuesday, March 31, 2015. This deadline will extend the current deadlines that apply to the Cambria Defendants and Mr. Denham. The Cambria Defendants are mindful of the Court’s rule providing that any requests for adjournments or extensions must be received in Chambers at least two business days before the scheduled date. As explained in further detail below, counsel for all named Defendants anticipated submitting a Stipulation before today that would be signed by *all parties*, and which would memorialize the parties’ agreement to the requests herein.

¹ Space 150 Inc. agrees to accept service for Space 150, LLC, which is the named Defendant in this action, but which has not been in formal existence for several years.



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All named Defendants also respectfully request that the pre-trial conference, currently scheduled for March 27, 2015, occur after the new due date for answers or other responses to the complaint. Accordingly, we propose Friday, April 10, 2015, Friday, April 17, 2015, or another date at the Court's convenience. No prior extension requests have been made in this case.

The named Defendants believe that Plaintiff consents to these two requests. Plaintiff's counsel, Mr. Steckman, has orally agreed on telephone calls that occurred on the evenings of Monday, March 9, 2015 and Tuesday, March 10, 2015. Plaintiff's counsel also circulated a draft Stipulation on Wednesday, March 11, 2015, which set forth the parties' agreement regarding the March 31, 2015 deadline and request to adjourn the conference (among other things), which was revised and recirculated yesterday evening. However, we have not heard from Plaintiff's counsel since late yesterday afternoon, and he has not responded to our numerous communications. Given the immediate nature of the deadline that applies to the Cambria Defendants, and Mr. Steckman's unresponsiveness, the Cambria Defendants and the Space150 Defendants believe that filing this letter with the Court is the most prudent course of action.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kristen McCallion", with a long, sweeping horizontal line extending to the right.

Kristen McCallion
Principal

cc via ECF: Robert Steckman
James K. Stronski
Bruce H. Little (motion for *pro hac vice* forthcoming)